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Attorneys for Defendant WAL-MART STORES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BETTY DUKES, PATRICIA SURGESON, EDITH ARANA,
DEBORAH GUNTER, and CHRISTINE KWAPNOSKI, on
behalf of themselves and all others similarly situated,

Plaintiffs,

v.

WAL-MART STORES, INC.,

Defendant.

Case No. C-01-2252-CRB

**STIPULATION AND
~~PROPOSED~~ ORDER
REGARDING SCHEDULE
FOR RESPONSE TO
MOTION TO EXCLUDE
DECLARATION OF DR.
DROGIN**

The undersigned counsel, on behalf of Plaintiffs Betty Dukes, Patricia Surgeson, Edith Arana, Deborah Gunter, and Christine Kwapnoski ("Plaintiffs") and Defendant Wal-Mart Stores, Inc.

(“Wal-Mart,” and collectively, with Plaintiffs, the “Parties”), hereby stipulate as follows:

WHEREAS Defendant filed its motion to exclude the declaration of Dr. Richard Drogin on May 31, 2013, such that Plaintiffs’ opposition would otherwise be due on June 14, 2013; and

WHEREAS the motion includes reference to the declaration of Dr. Edward Lazear, Defendant’s expert, but Dr. Lazear’s schedule makes him unavailable for deposition prior to June 17, 2014; and

WHEREAS Plaintiffs request, and Wal-Mart does not oppose, the opportunity to depose Dr. Lazear before responding to the motion to exclude Dr. Drogin;

THEREFORE, the Parties stipulate as follows:

1. Plaintiffs’ Opposition to Defendant’s Motion to Exclude the Declaration of Dr. Drogin shall be filed on June 19, 2013, by 5:00 pm PDT;

2. Wal-Mart’s Reply in Support of its Motion to Exclude shall be filed on or before 5:00 pm PDT on June 26, 2013.

3. This stipulation does not alter the hearing date on Plaintiffs’ pending motion for class certification or otherwise alter the briefing schedule for that or any related motions.

IT IS SO STIPULATED.

Dated: June 6, 2013

By: /s/Christine E. Webber

By: /s/ Theodore J. Boutrous, Jr.

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**I, Christine E. Webber, attest that
concurrence in the filing of this document
has been obtained from the other
signatory.**

~~PROPOSED~~ ORDER

Pursuant to the above stipulation, the Stipulation and Order regarding schedule for briefing on Defendant's Motion to Exclude the Declaration of Dr. Drogin is approved.

DATE: June 12, 2013

